

Exhibit H



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wpoynter@kaleolegal.com

April 6, 2020

VIA ELECTRONIC MAIL

Chady Tawil, CEO
MOZAICO
1591 Lighthouse Drive
Naperville, Illinois, 60565
info@mozaico.com

Re: Willful Trademark and Copyright Infringement

Dear Sir:

This firm represents New Ravenna, which is America's premier designer and manufacturer of stone and glass mosaic tiles for both residential and commercial installations. New Ravenna mosaic tile designs are sold through nearly 200 exclusive designer showrooms across the country and internationally, and the company provides design services along with on-site supervision of installations. New Ravenna mosaics have been featured in national architectural and interior design magazines and are found in homes, restaurants, hotels, casinos and businesses around the world.

New Ravenna is the exclusive owner of all copyrights and other intellectual property rights in the mosaic tile designs and marks that appear on the New Ravenna website at www.newravenna.com ("New Ravenna Designs"). As a result of New Ravenna's exclusive and widespread advertising, use and promotion over more than twenty years, the New Ravenna Designs are widely recognized by consumers as a designation of New Ravenna's goods and services, and New Ravenna has developed extensive goodwill in its New Ravenna Designs. What is more, the Avila Design is covered by Copyright Registration No. VA0002085265, and the Reina Design is covered by Copyright Registration No. VA0002164004.

New Ravenna has previously informed you of your infringement of several of its copyrighted designs, on two separate occasions dating back to May 12, 2015. Unfortunately, it has again come to our attention that you are offering a multitude of mosaic tile designs that are identical and/or substantially similar to many of the New Ravenna Designs. Attached hereto as Exhibit A is a complete list of those designs together with the online locations where each can be found.

Because you do not have permission from New Ravenna, your use of the New Ravenna Designs set forth on Exhibit A constitutes copyright infringement under The Copyright Act, 17 USC § 101 et al., and potentially trade dress infringement and unfair competition under the Lanham Act, 15 USC § 1125, as well. As a result of this conduct, New Ravenna may be entitled to preliminary and permanent injunctive relief against your continued use of the New Ravenna Designs, in addition to recovering its damages and costs. What is more, because of the nature of the infringement, and the fact that Mozaico is a serial and willful infringer of so many New Ravenna Designs, New Ravenna may be entitled to recover trebled damages and attorney fees in any lawsuit to enforce its rights.

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Mozaico
Page 2

We therefore demand that you immediately cease all uses of the New Ravenna Designs, and any other New Ravenna designs or intellectual property, within seven days of receipt of this letter, and confirm in writing that you have done so, including the removal of all references to New Ravenna or its designs from all advertising, promotional materials, in store displays, and websites. We also demand that you confirm your agreement in writing never to use the New Ravenna Designs, trade dress, trademarks, or other intellectual property by signing below. If we do not receive written confirmation within seven days, we will advise our client to pursue all legal remedies available to it.

New Ravenna appreciates your respect for its intellectual property. Please contact me as soon as possible to discuss resolution of this matter. I look forward to hearing from you.

Very truly yours,



William R. Poynter

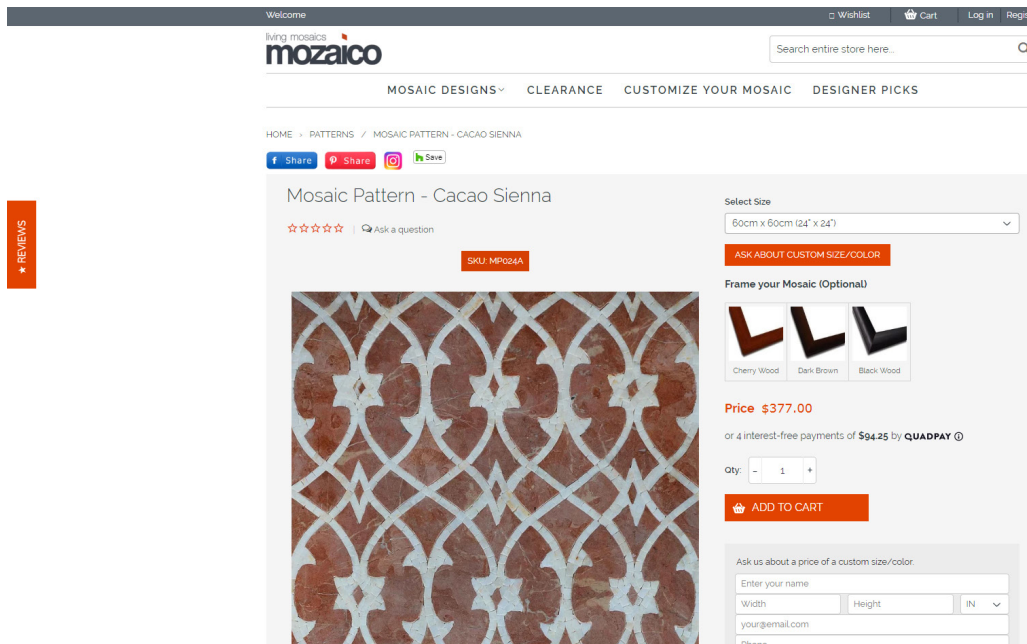
SEEN AND AGREED:

Mozaico

cc: New Ravenna, LLC

PRODUCTS FOUND AT: [HTTPS://WWW.MOZAICO.COM/](https://www.mozaico.com/)

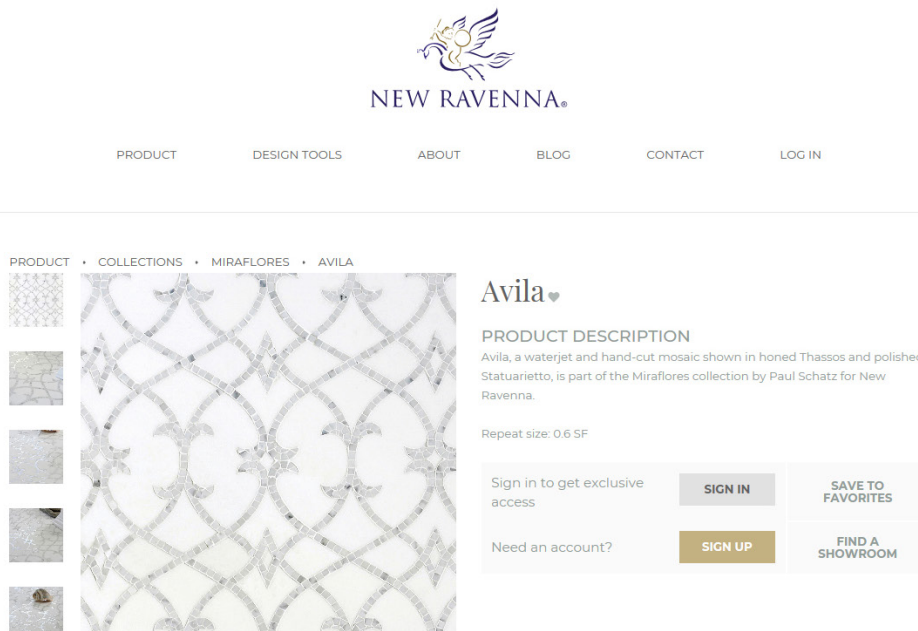
MOZAICO VERSION



LINK:

https://www.mozaico.com/collections/mosaic-patterns/products/mosaics-designs_patterns_mosaic-pattern-cacao-sienna_mp024a

NEW RAVENNA VERSION - AVILA

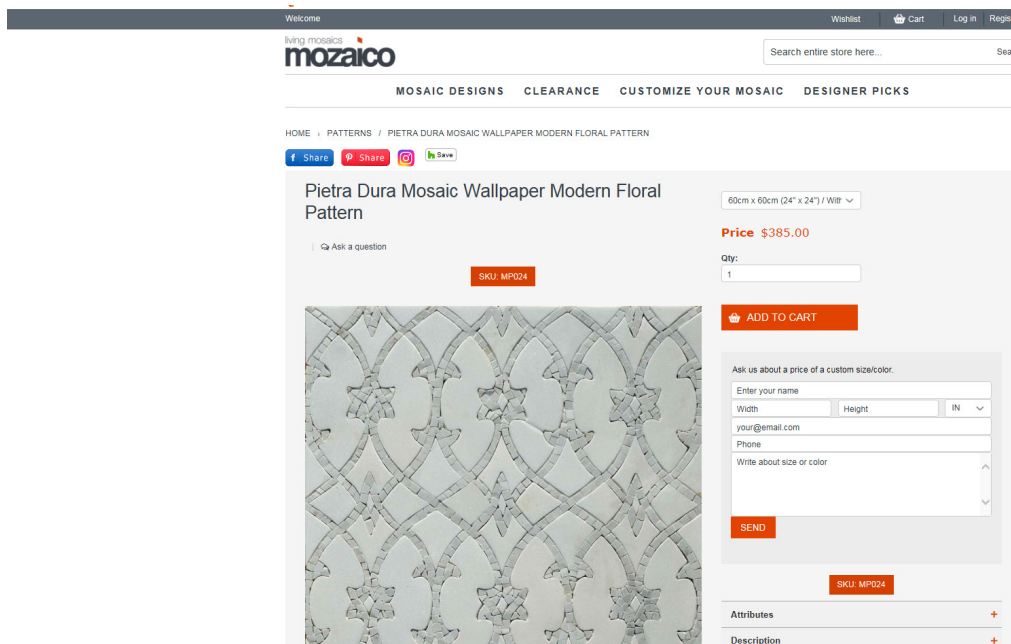


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<https://newravenna.com/nr-product/avila-statuarietto/>

PRODUCTS FOUND AT: [HTTPS://WWW.MOZAICO.COM/](https://www.mozaico.com/)

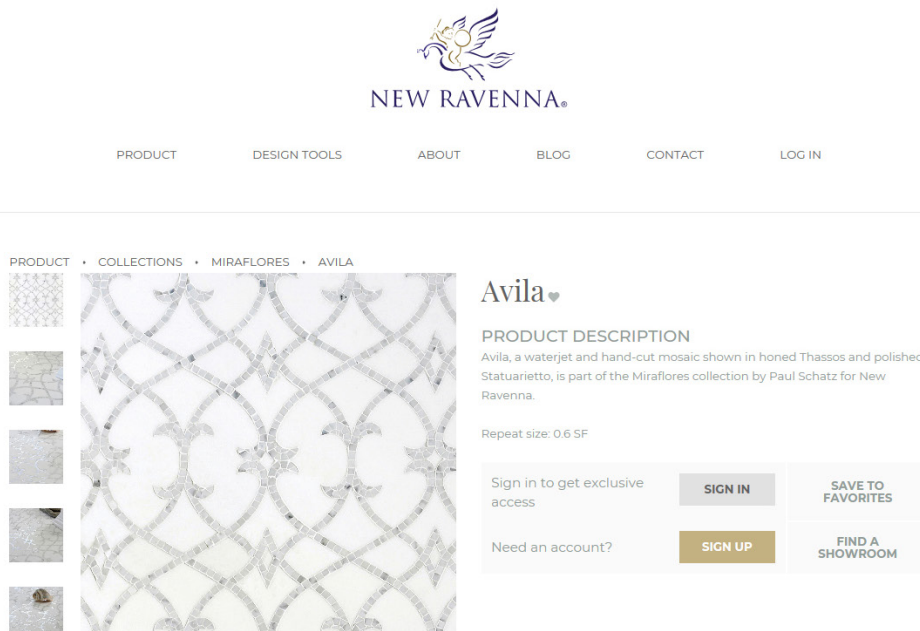
MOZAICO VERSION



LINK:

https://www.mozaico.com/collections/mosaic-patterns/products/mosaics-designs_geometric_pietra-dura-mosaic-wallpaper-modern-floral-pattern_mp024

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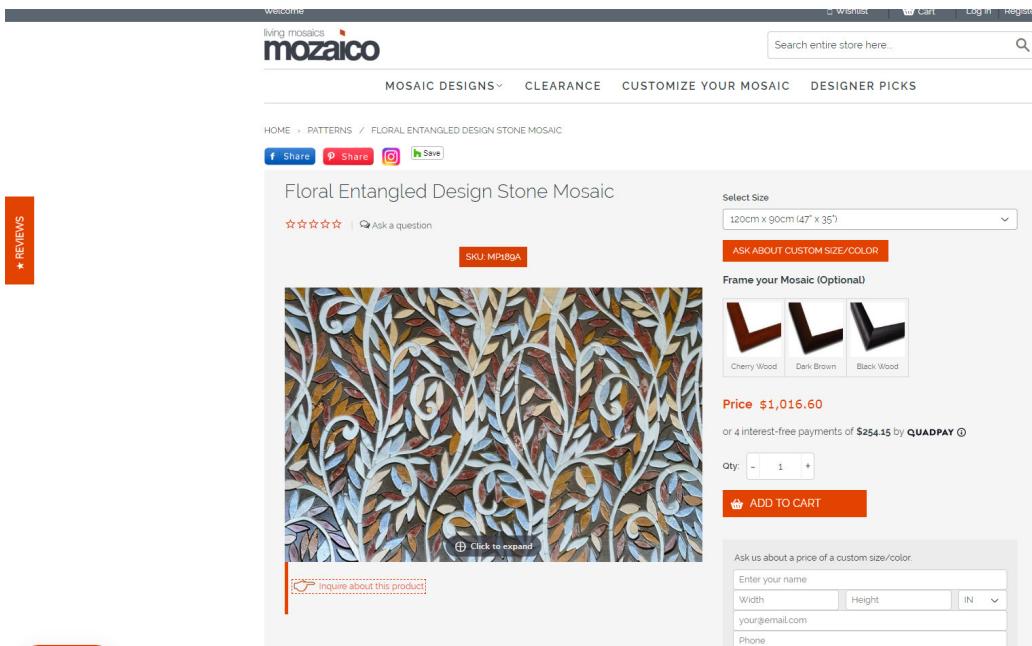


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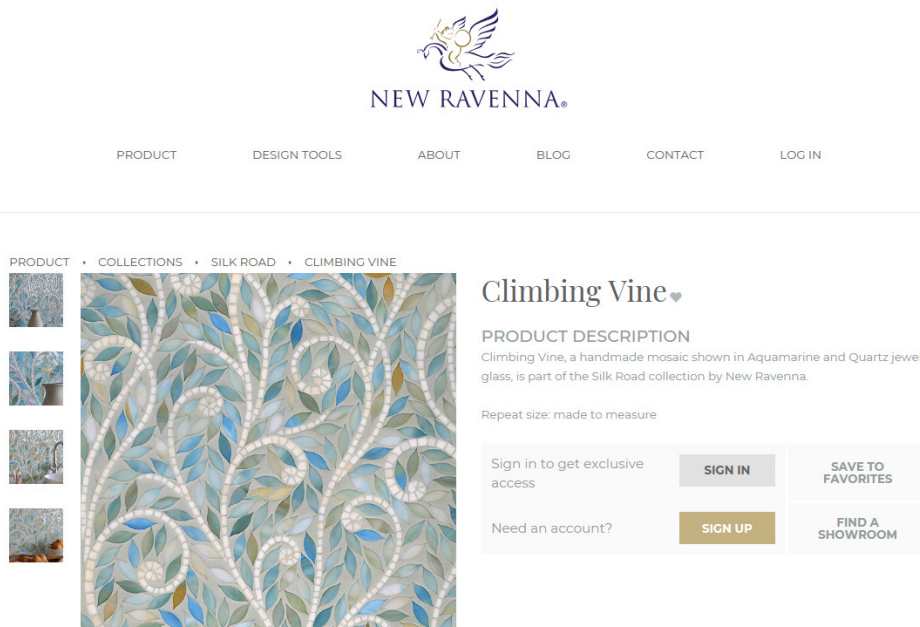
MOZAICO VERSION



LINK:

https://www.mozaico.com/collections/mosaic-patterns/products/mosaics-designs_flowers-and-trees_floral-entangled-design-stone-mosaic_mp189a

NEW RAVENNA VERSION - CLIMBING VINE

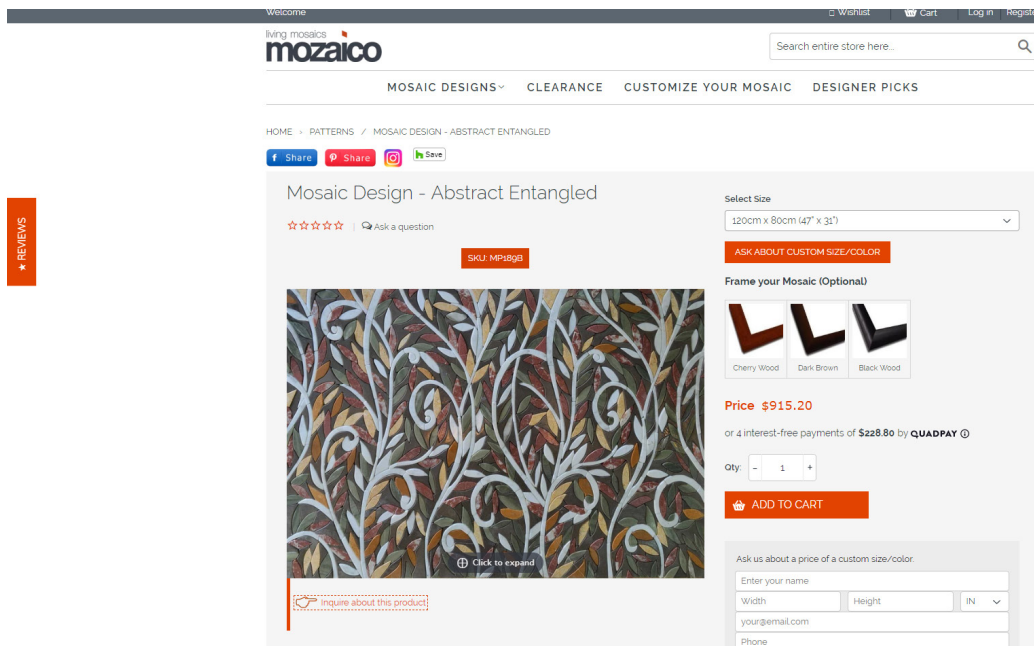


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<https://newravenna.com/nr-product/climbing-vine-aquamarine/>

PRODUCTS FOUND AT: [HTTPS://WWW.MOZAICO.COM/](https://www.mozaico.com/)

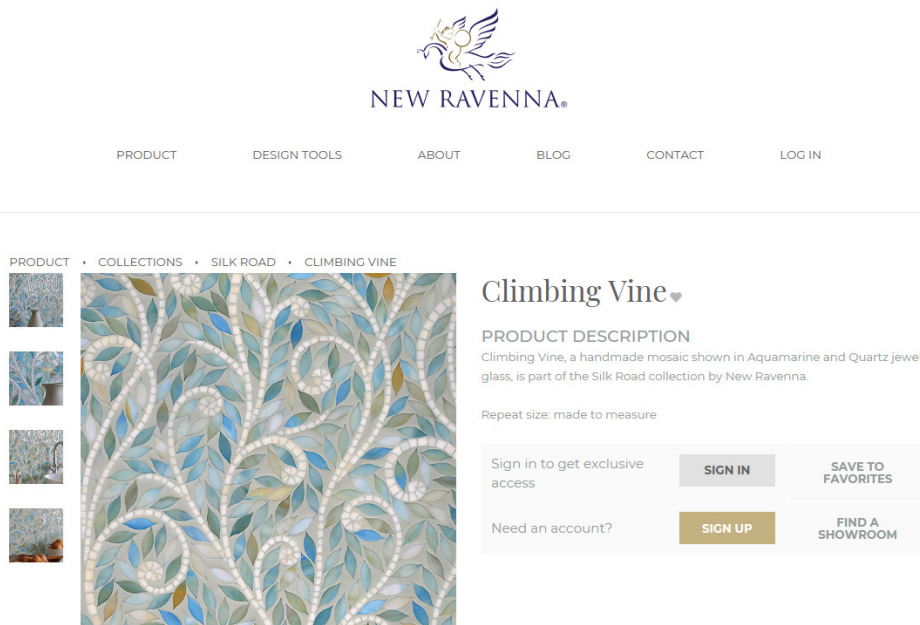
MOZAICO VERSION



LINK:

https://www.mozaico.com/collections/mosaic-patterns/products/mosaics-designs_flowers-and-trees_mosaic-design-abstract-entangled_mp189b

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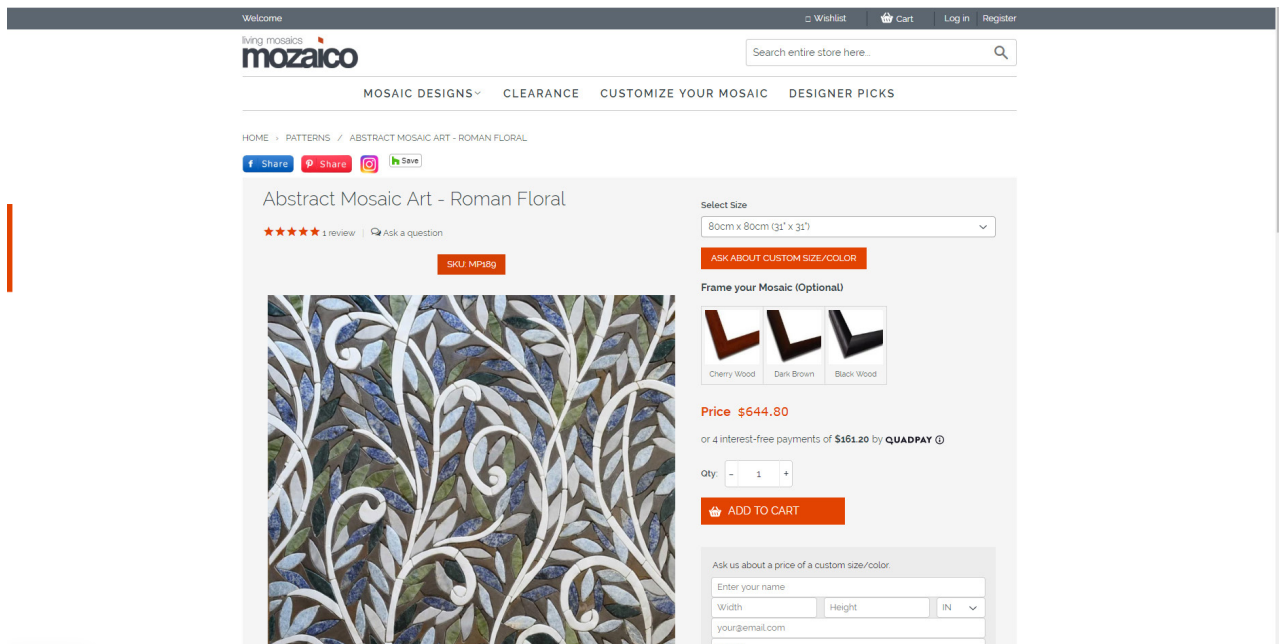


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PRODUCTS FOUND AT: [HTTPS://WWW.MOZAICO.COM/](https://www.mozaico.com/)

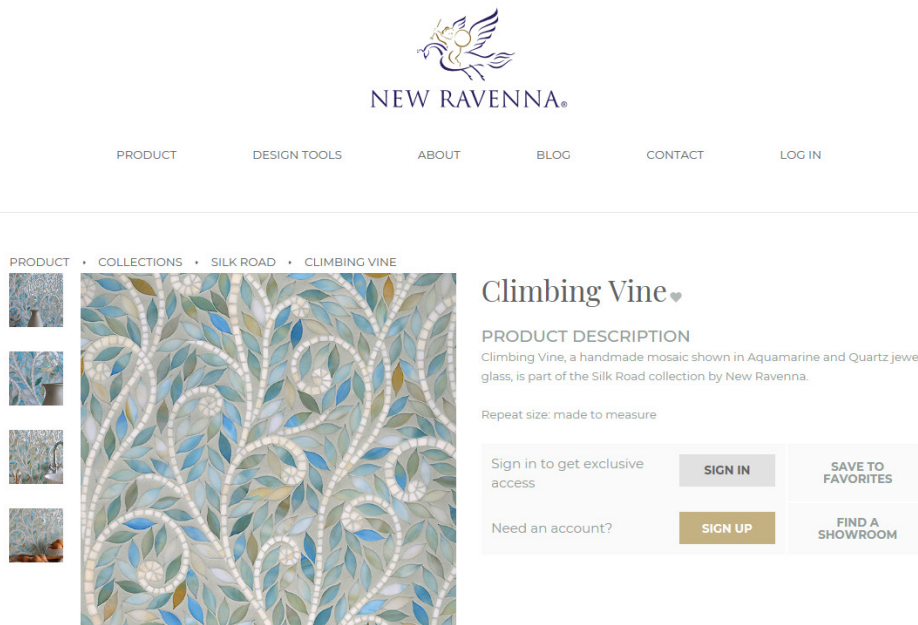
MOZAICO VERSION



LINK:

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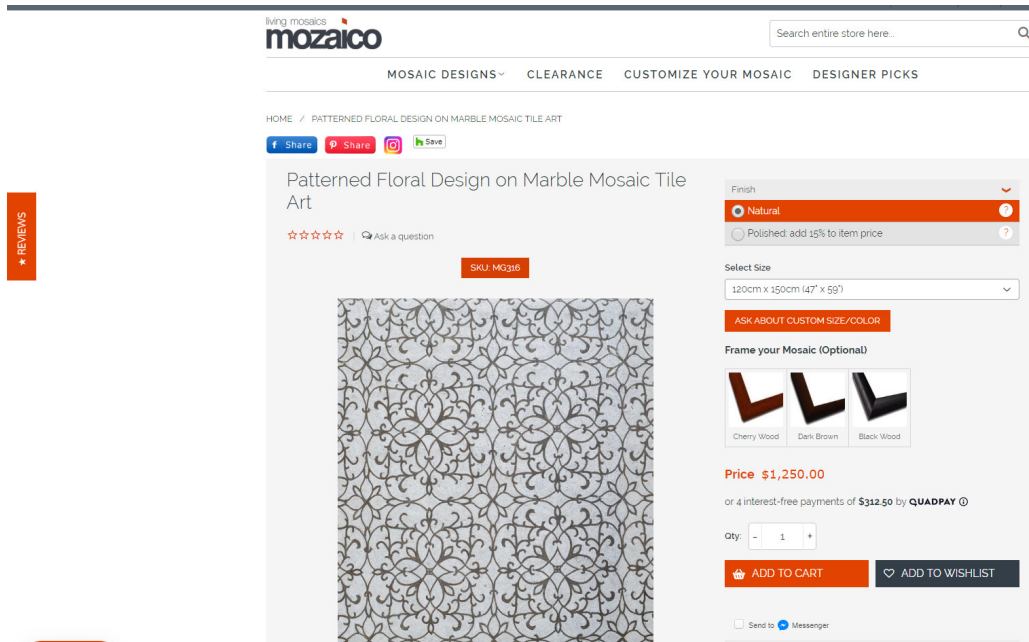


LINK:

<https://newravenna.com/nr-product/climbing-vine-aquamarine/>

PRODUCTS FOUND AT: [HTTPS://WWW.MOZAICO.COM/](https://www.mozai.co.com/)

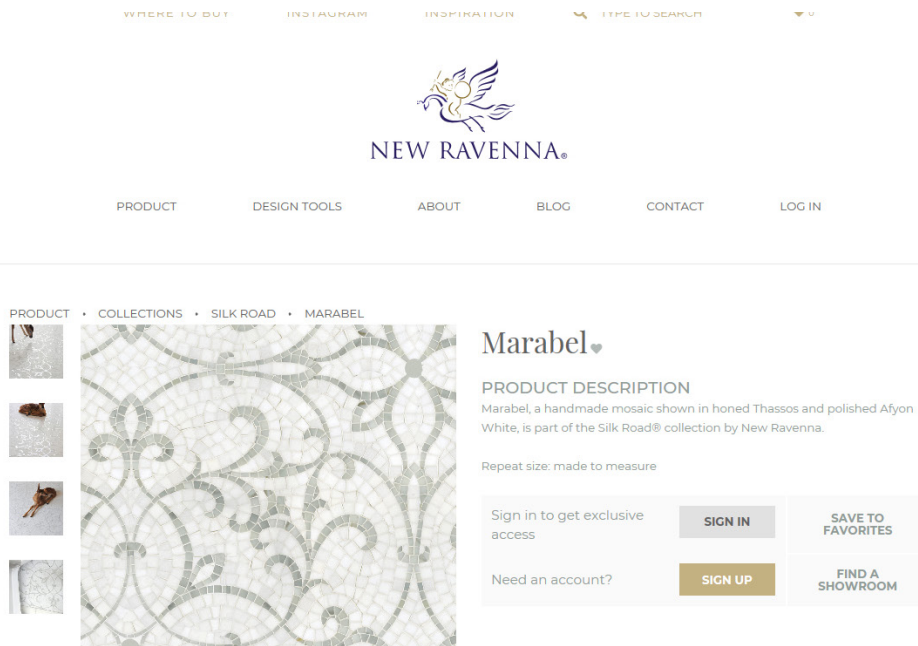
MOZAICO VERSION



LINK:

https://www.mozai.co.com/products/mosaics-designs_patterns_patterned-floral-design-on-marble-mosaic-tile-art_mg316

NEW RAVENNA VERSION - MARABEL



LINK:

<https://newravenna.com/nr-product/marabel/>

PRODUCTS FOUND AT: [HTTPS://WWW.MOZAICO.COM/](https://www.mozaico.com/)

MOZAICO VERSION

Welcome

living mosaics
mozaico

MOSAIC DESIGNS

CLEARANCE

CUSTOMIZE YOUR MOSAIC

DESIGNER PICKS

HOME / MOSAIC PATTERNS - OCEAN WAVES

Share


Share

Save

Mosaic Patterns - Ocean Waves

☆☆☆☆ | Ask a question

SKU: MG239G



Finish

☒ Natural

☐ Polished add 15% to item price

Select Size

130cm x 120cm (51" x 47")

ASK ABOUT CUSTOM SIZE/COLOR

Frame your Mosaic (Optional)

Cherry Wood

Dark Brown

Black Wood

Price \$1,094.00


or 4 interest-free payments of \$273.50 by **QUADPAY**

Qty: 1

ADD TO CART

LINK:
https://www.mozaico.com/products/mosaics-designs_patterns_mosaic-patterns-ocean-waves_mg239g

NEW RAVENNA VERSION - MIRAGE


NEW RAVENNA

PRODUCT

DESIGN TOOLS

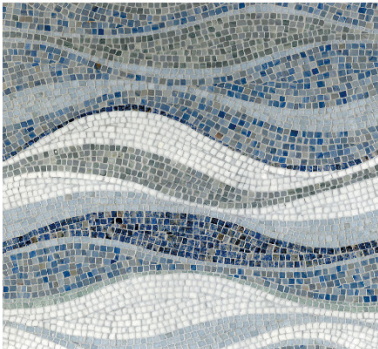

ABOUT

BLOG

CONTACT

LOG IN

PRODUCT • COLLECTIONS • METAMORPHOSIS • MIRAGE



Mirage

PRODUCT DESCRIPTION

Mirage, a hand-chopped mosaic shown in tumbled Kay's Green, Celeste, Thassos, Blue Macauba, Blue Bahia, Ming Green, Travertine White and Verde Luna.

Repeat size: made to measure

Sign in to get exclusive access

SIGN IN

SAVE TO FAVORITES

Need an account?

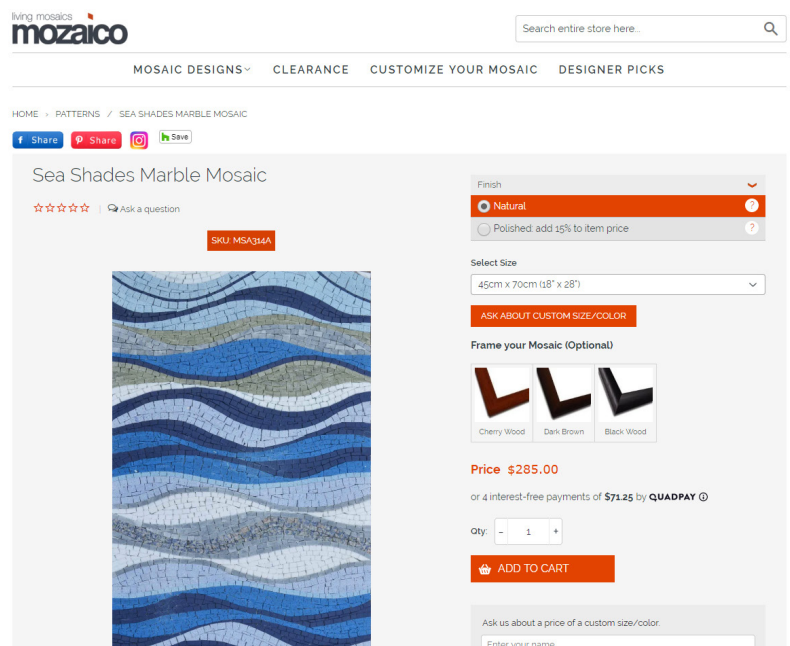
SIGN UP

FIND A SHOWROOM

LINK:
<https://newravenna.com/nr-product/mirage/>

PRODUCTS FOUND AT: [HTTPS://WWW.MOZAICO.COM/](https://www.mozaico.com/)

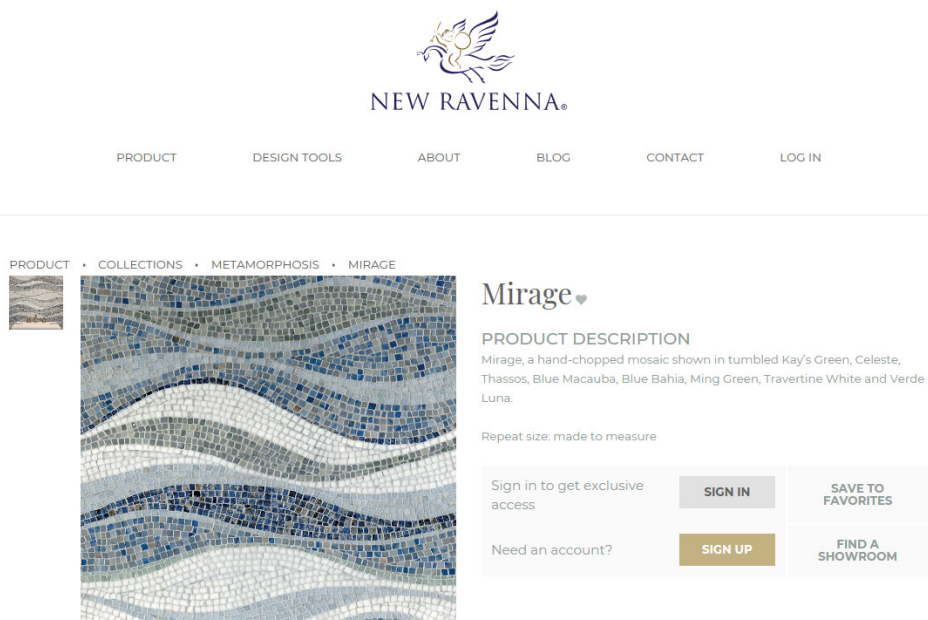
MOZAICO VERSION



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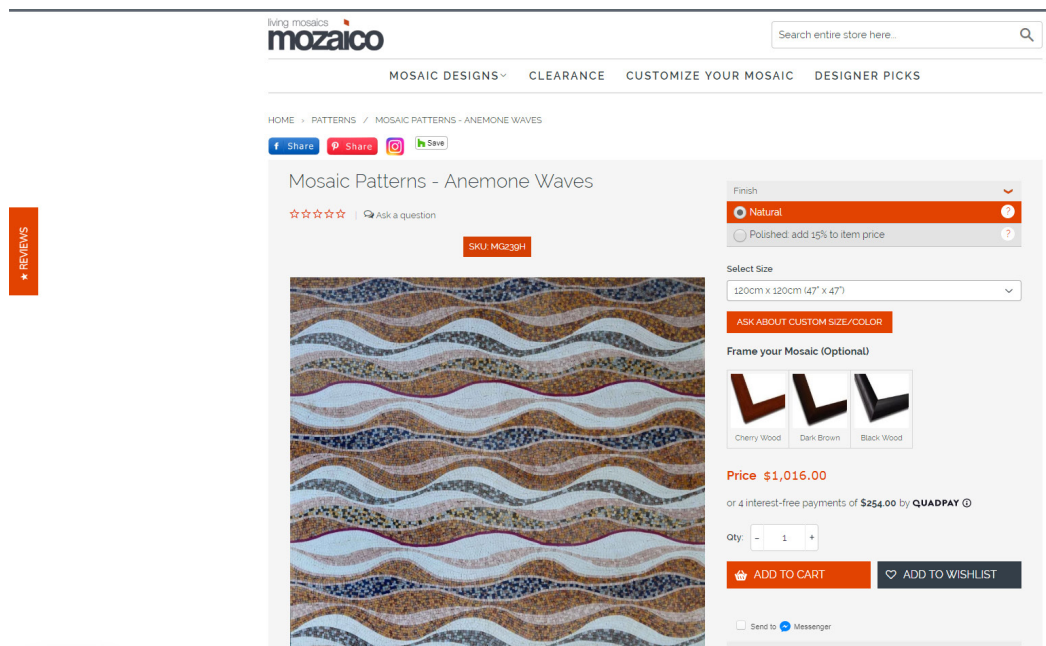


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<https://newravenna.com/nr-product/mirage/>

PRODUCTS FOUND AT: [HTTPS://WWW.MOZAICO.COM/](https://www.mozaico.com/)

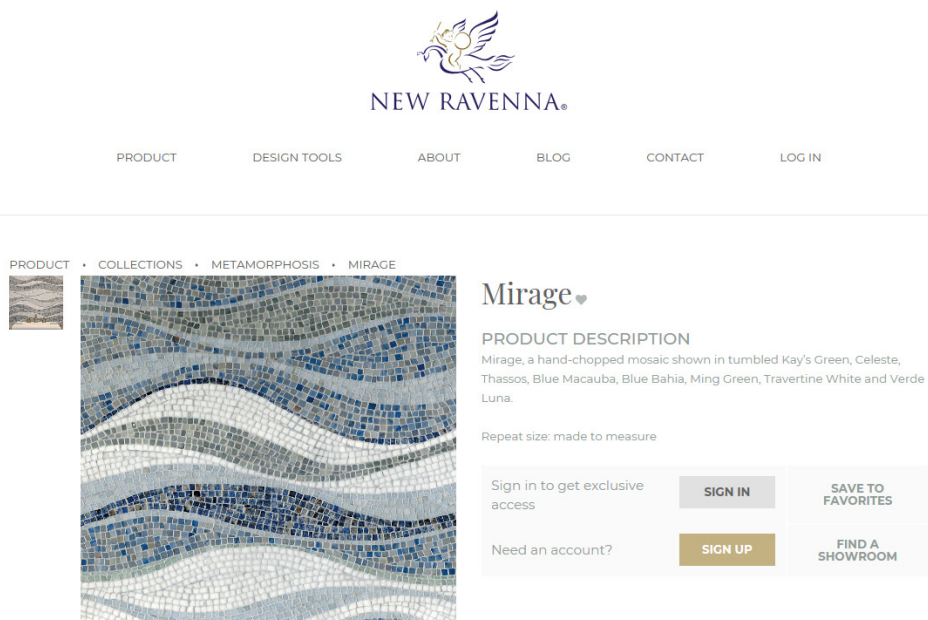
MOZAICO VERSION



LINK:

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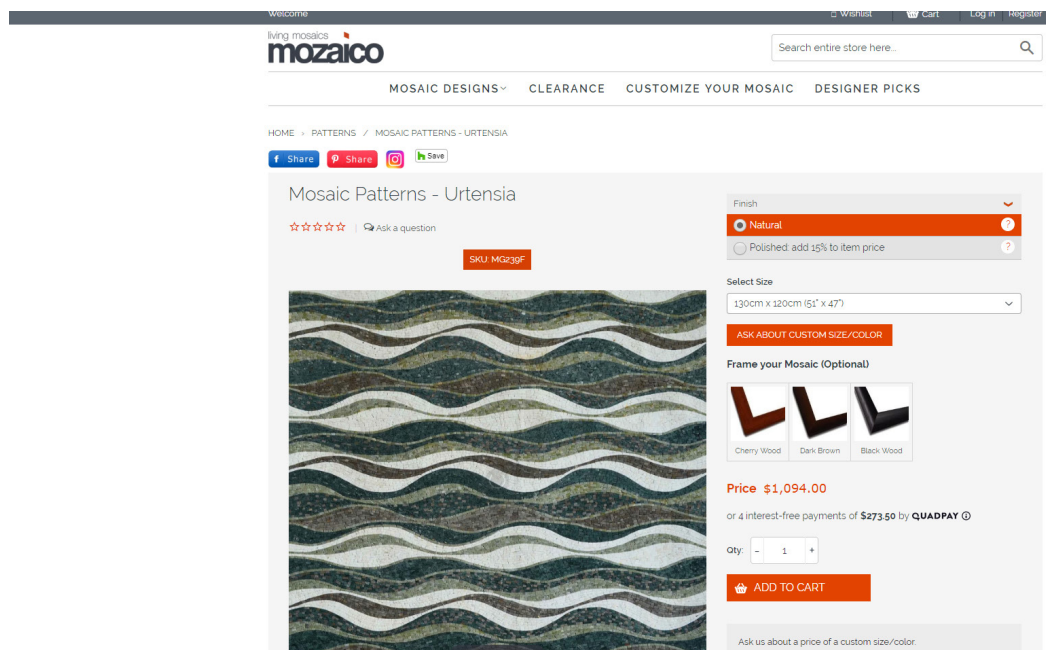


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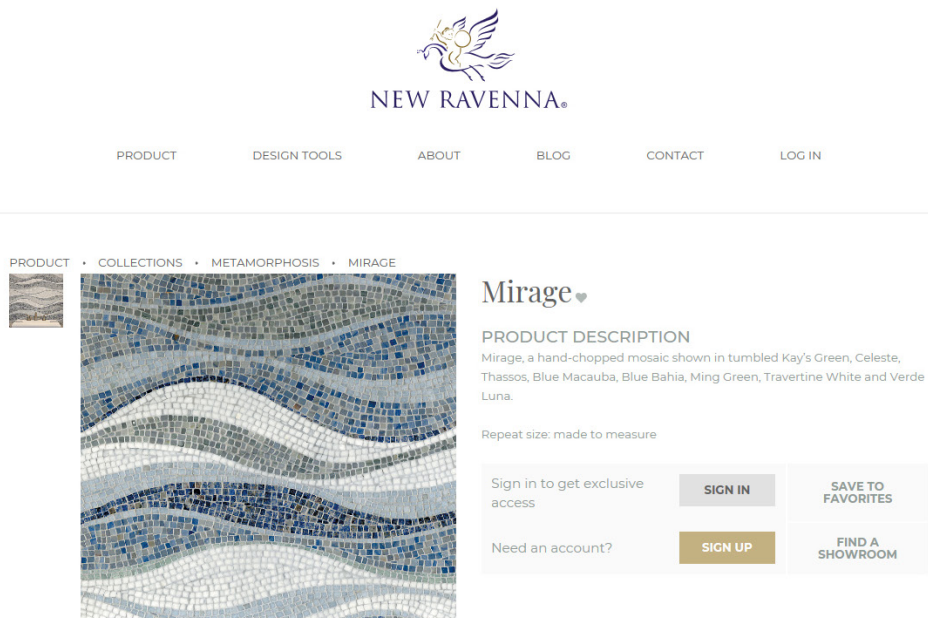
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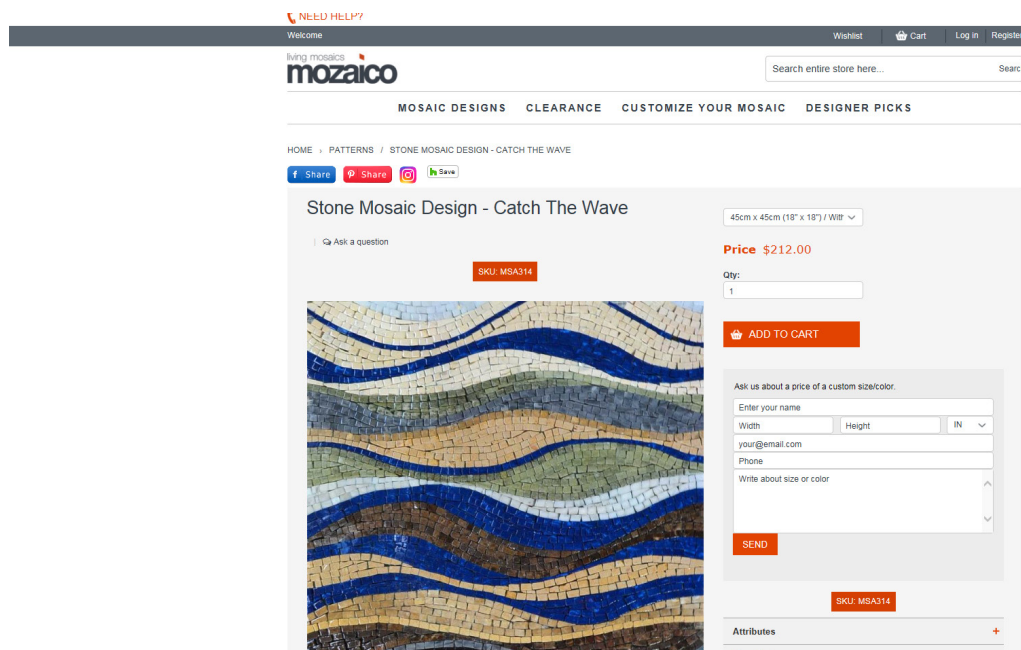


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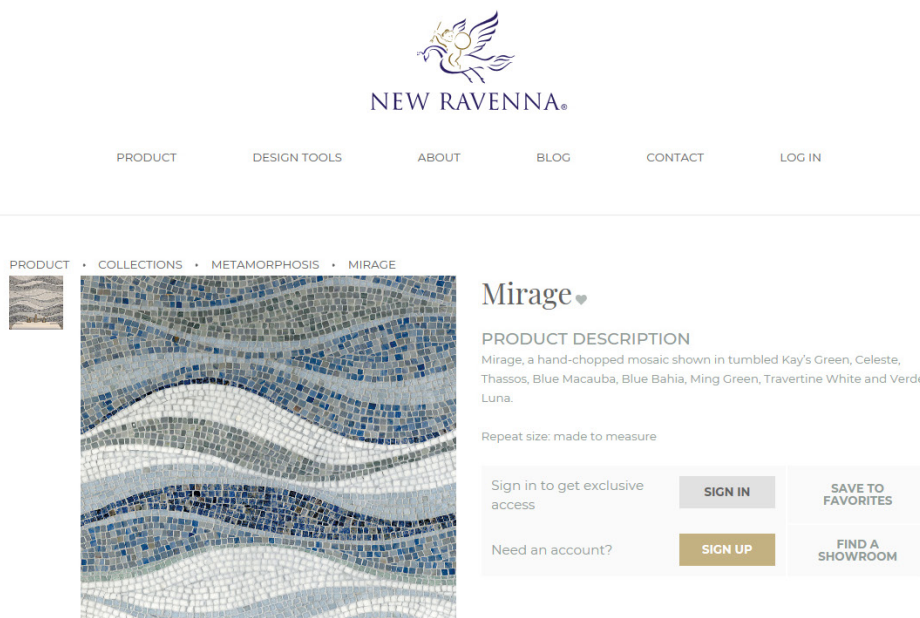
MOZAICO VERSION



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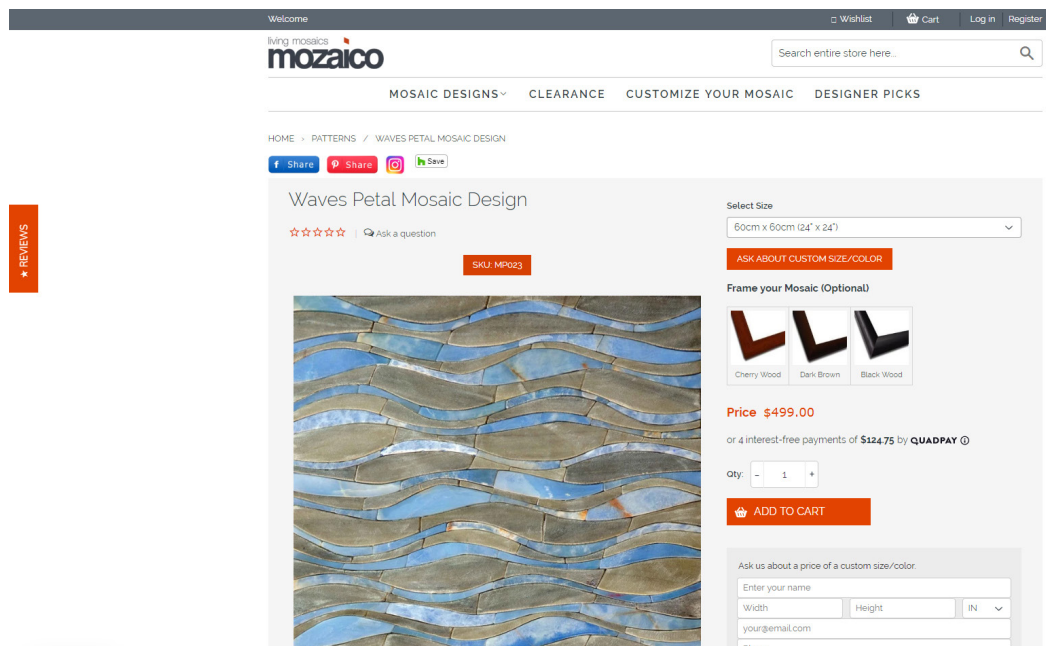


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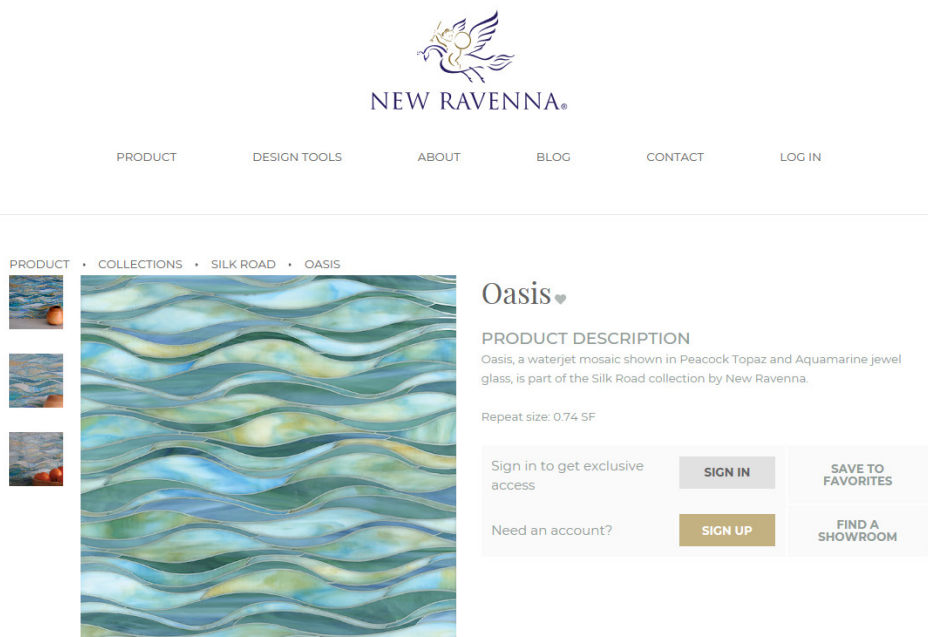
MOZAICO VERSION



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NEW RAVENNA VERSION - OASIS

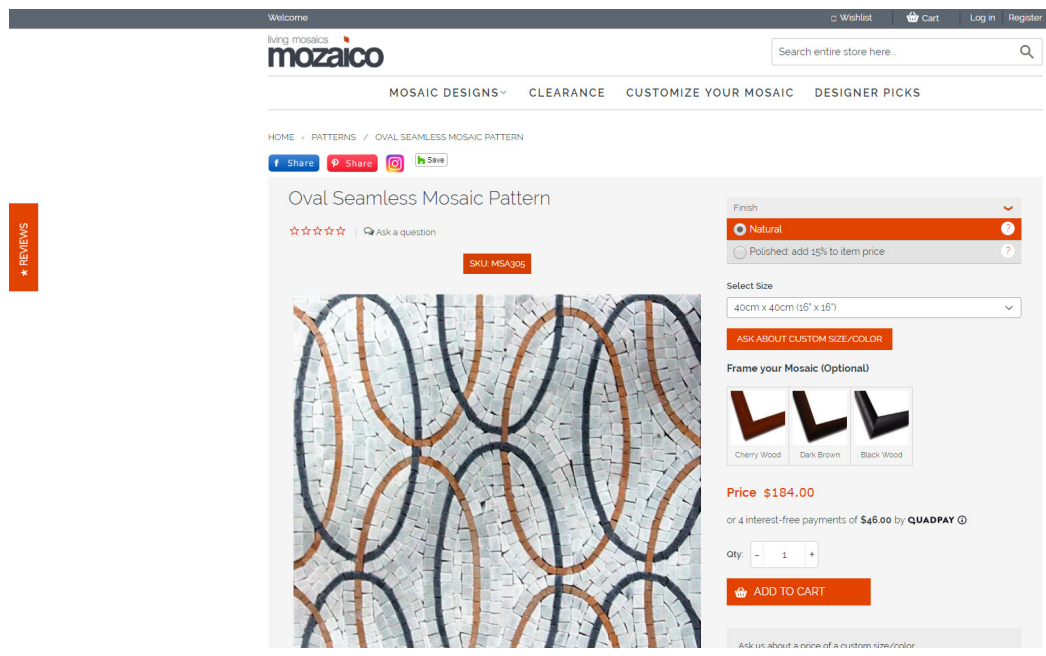


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PRODUCTS FOUND AT: [HTTPS://WWW.MOZAICO.COM/](https://www.mozaico.com/)

MOZAICO VERSION



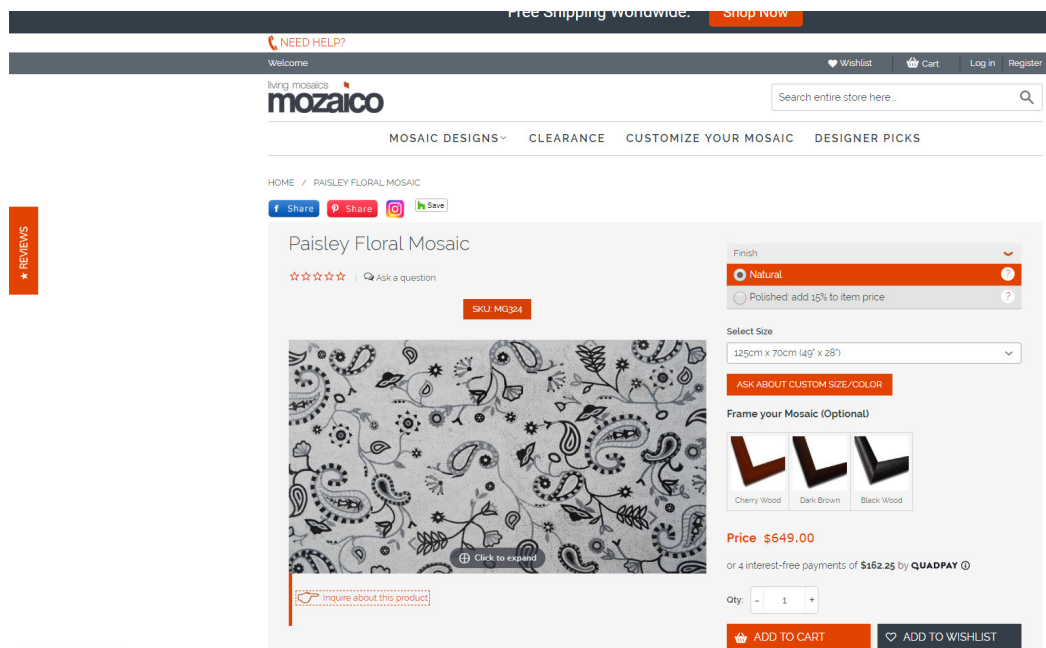
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NEW RAVENNA VERSION - OVAL OVERLAY



PRODUCTS FOUND AT: [HTTPS://WWW.MOZAICO.COM/](https://www.mozaico.com/)

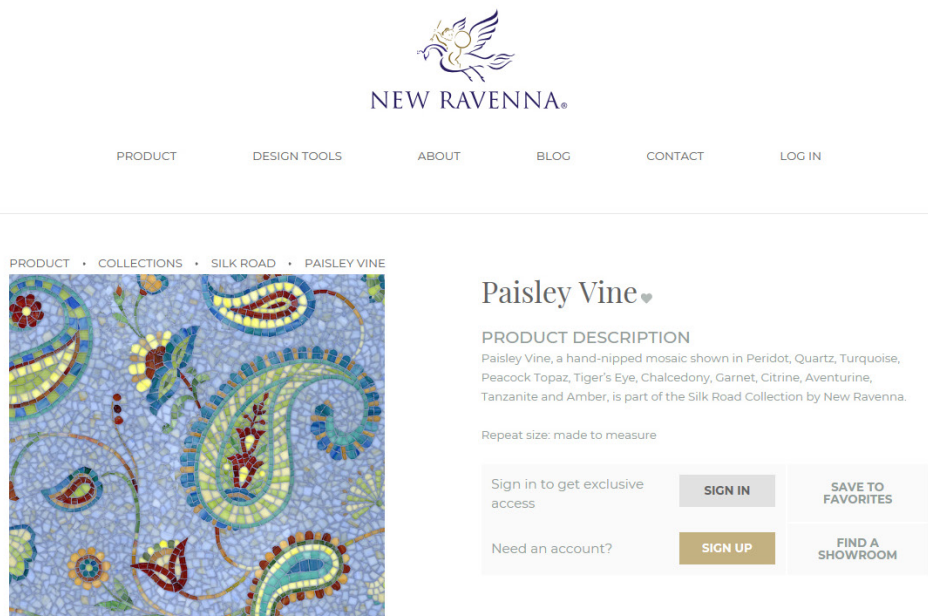
MOZAICO VERSION



LINK:

https://www.mozaico.com/products/mosaics-designs_patterns_paisley-floral-mosaic_mg324

NEW RAVENNA VERSION - PAISLEY VINE

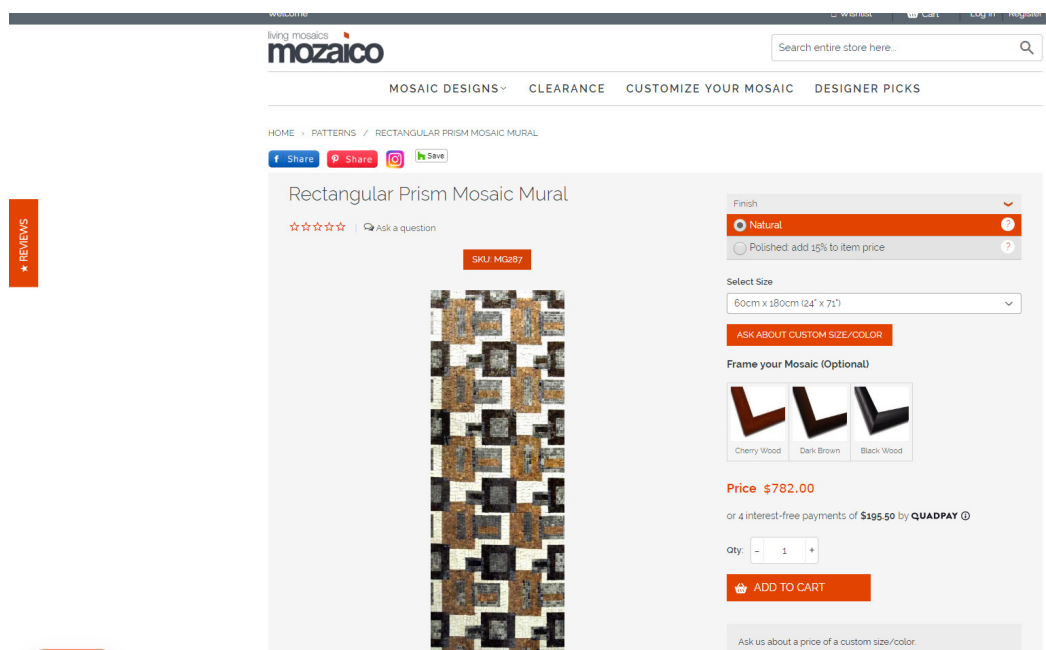


LINK:

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PRODUCTS FOUND AT: [HTTPS://WWW.MOZAICO.COM/](https://www.mozaico.com/)

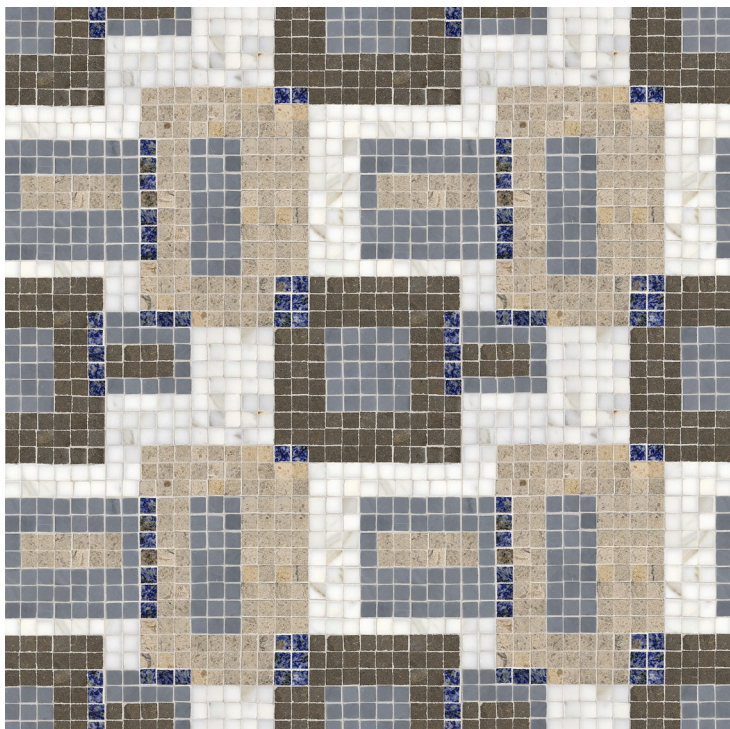
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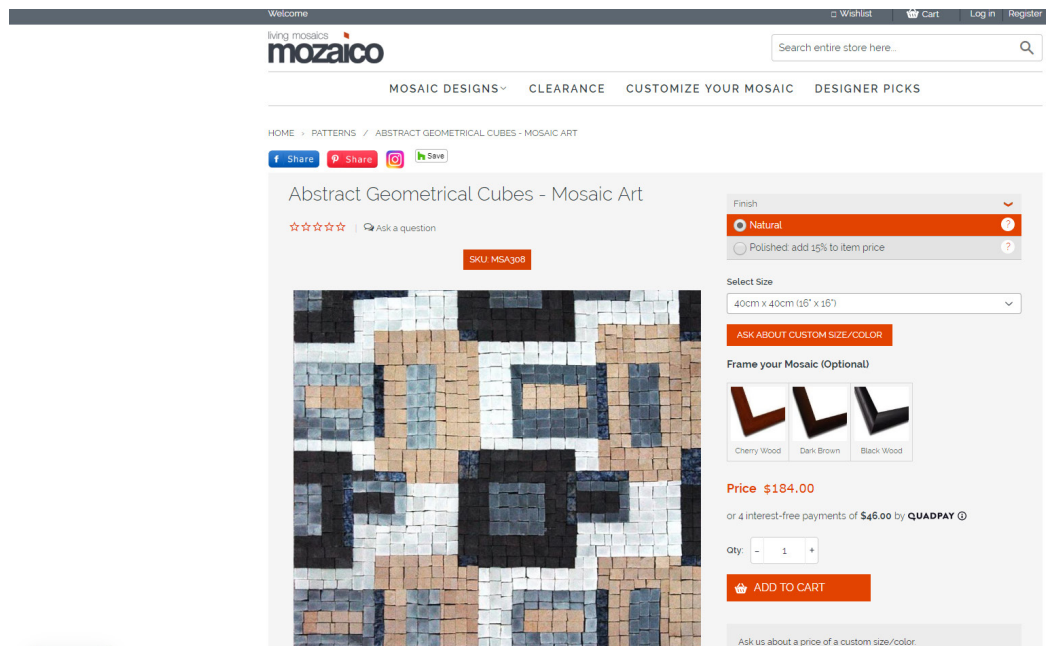
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NEW RAVENNA VERSION - RAZMATAZZ



PRODUCTS FOUND AT: [HTTPS://WWW.MOZAICO.COM/](https://www.mozaico.com/)

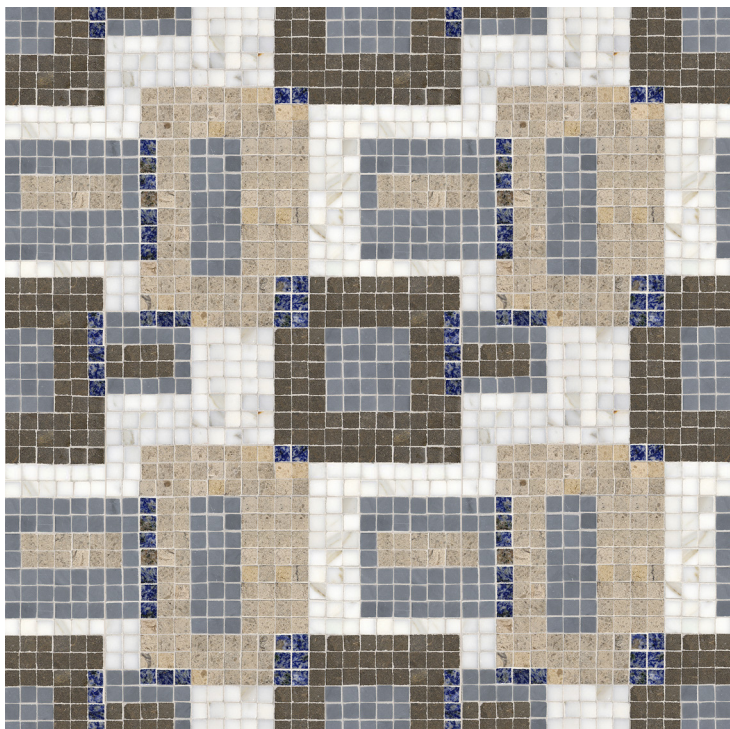
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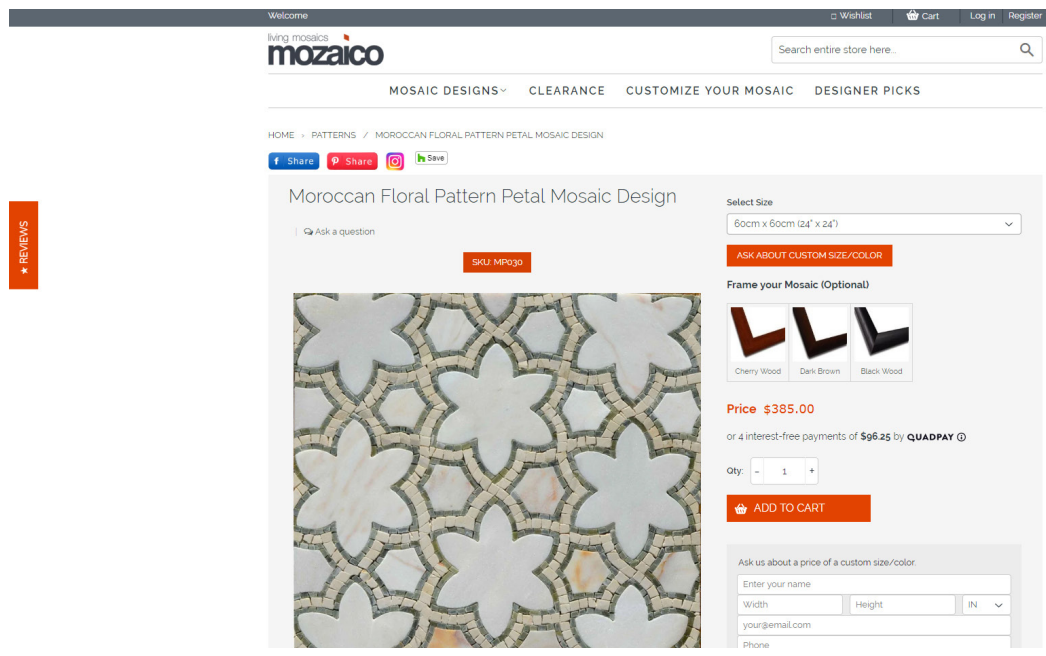
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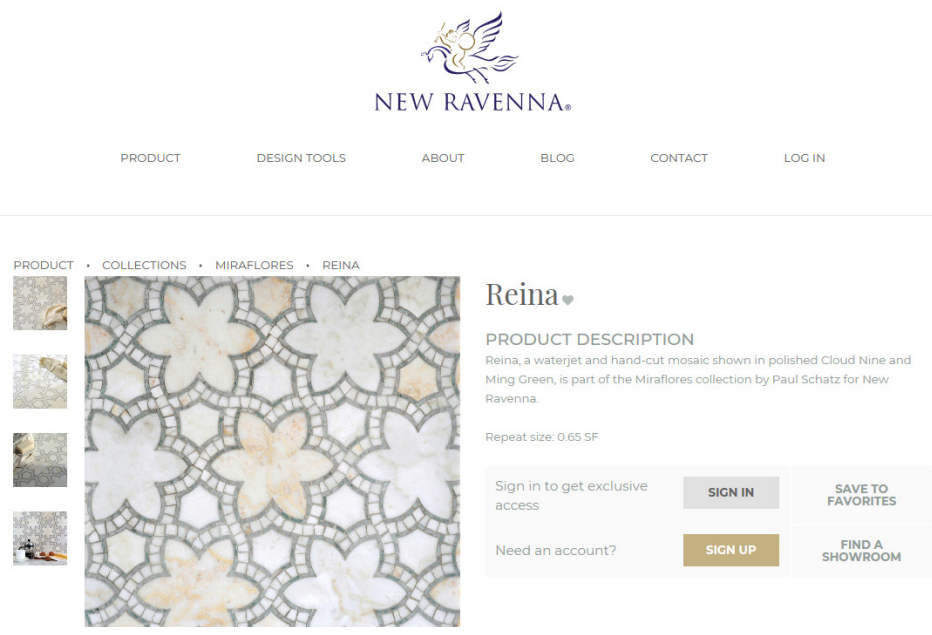
PRODUCTS FOUND AT: [HTTPS://WWW.MOZAICO.COM/](https://www.mozaico.com/)

MOZAICO VERSION



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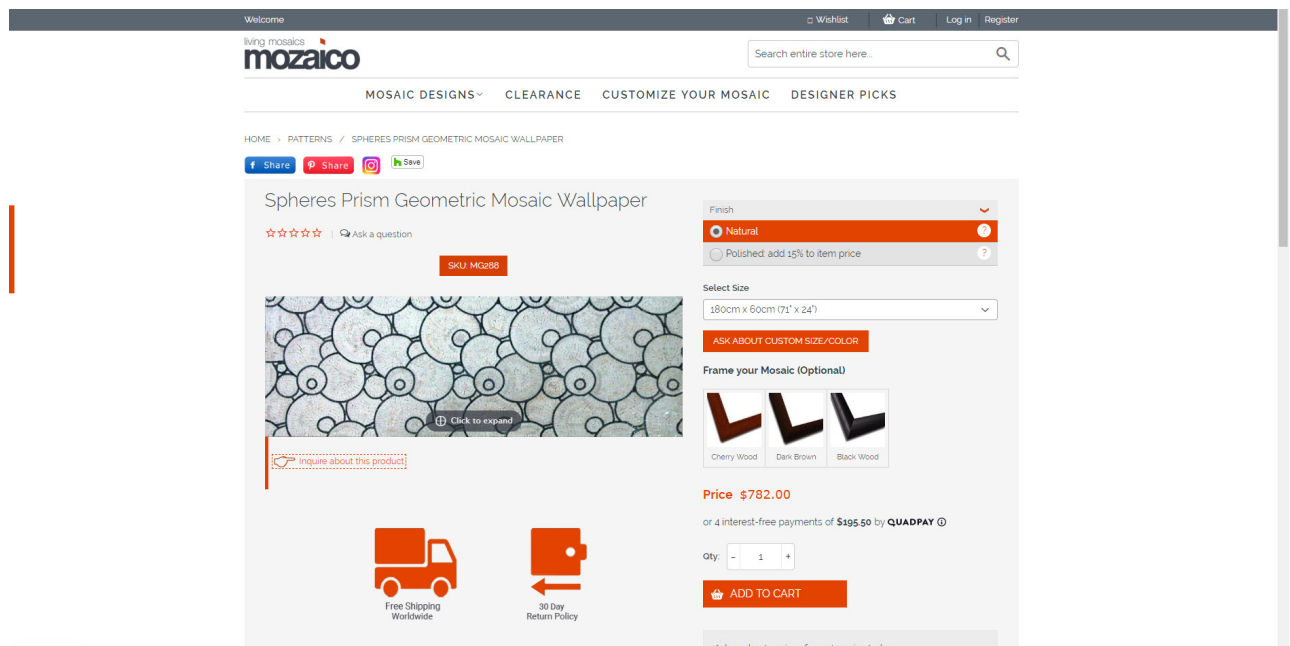
NEW RAVENNA VERSION - REINA



LINK:
<https://newravenna.com/nr-product/reina-cloud-nine/>

PRODUCTS FOUND AT: [HTTPS://WWW.MOZAICO.COM/](https://www.mozaico.com/)

MOZAICO VERSION



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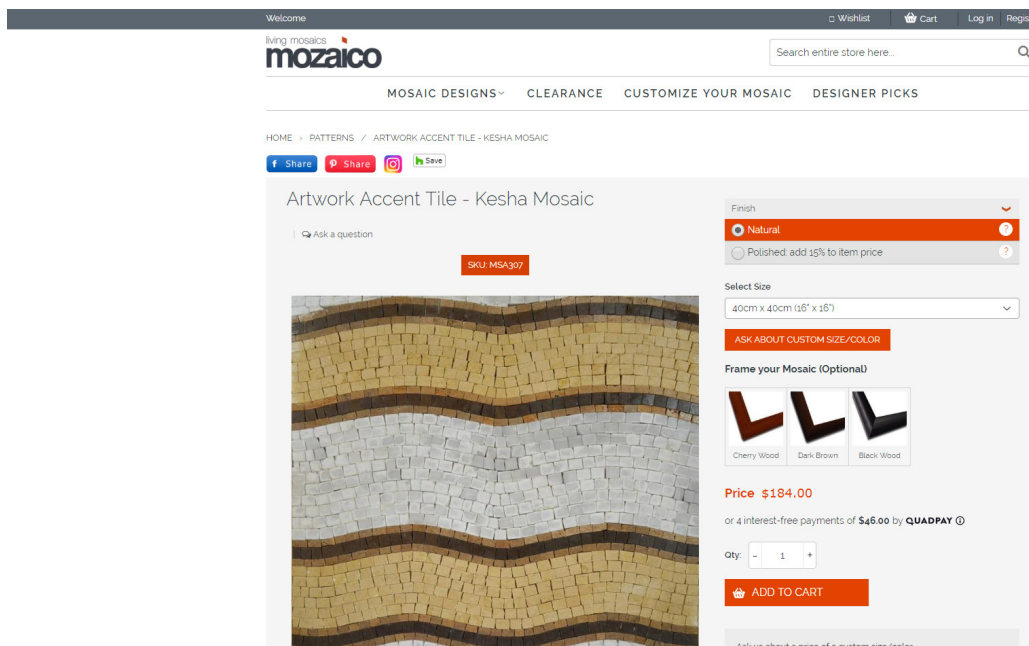
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NEW RAVENNA VERSION - RINGLET



PRODUCTS FOUND AT: [HTTPS://WWW.MOZAICO.COM/](https://www.mozaico.com/)

MOZAICO VERSION



LINK:

https://www.mozaico.com/collections/mosaic-patterns/products/mosaics-designs_patterns_art-work-accent-tile-kesha_msa307

NEW RAVENNA VERSION - SINE WAVE

